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3 FRANDZEL ROBINS BLOOM & CSATO, L.C.
1000 Wilshire Boulevard, Nineteenth Floor
4 Los Angeles, California 90017-2427
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6 Attorneys for Secured Creditor
ARCHWAY BROADWAY LOAN SPE, LLC
7

8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **LOS ANGELES DIVISION**
11

12 In re
13 SEATON INVESTMENTS, LLC, *et al.*,
14 Debtors and Debtors-in-
15 Possession.

16 Affects:

- 17 ☐ All Debtors
18 ☐ Seaton Investments, LLC
☐ Colyton Investments, LLC
19 ☒ Broadway Avenue Investments, LLC
☐ SLA Investments, LLC
20 ☐ Negev Investments, LLC
☐ Alan Gomperts
21 ☐ Daniel Halevy
22 ☐ Susan Halevy
23
24

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and
2:24-bk-12076-VZ

Chapter 11

**DECLARATION OF GERRICK M.
WARRINGTON IN SUPPORT OF REPLY
IN SUPPORT OF ARCHWAY
BROADWAY LOAN SPE, LLC'S
RENEWED MOTION FOR RELIEF
FROM AUTOMATIC STAY**

Date: December 10, 2024
Time: 10:30 a.m.
Crtrm.: 1368
255 E. Temple Street
Los Angeles, CA 90012

Hon. Vincent P. Zurzolo

FRANDZEL ROBINS BLOOM & CSATO, L.C.
1000 WILSHIRE BOULEVARD, NINETEENTH FLOOR
LOS ANGELES, CALIFORNIA 90017-2427
(323) 852-1000

1 I, Gerrick M. Warrington, declare:

2 1. I am a partner at Frandzel Robins Bloom & Csato, L.C., counsel of record for
3 secured creditor Archway Broadway Loan SPE, LLC, a Delaware limited liability company,
4 successor in interest to Archway Real Estate Income Fund I REIT, LLC fka Archway Real Estate
5 Income Fund I SPE I, LLC (“Archway”). If called as a witness, I could and would competently
6 testify to all facts within my personal knowledge, except where stated upon information and belief.

7 2. This declaration is submitted in support of Archway’s Renewed Motion for Relief
8 from Stay (Dkt. 299).

9 3. On or about November 25, 2024, Archway issued discovery, including subpoenas
10 directed to the proposed tenants, The DMB Fund and Levav Group LLC, as well as the proposed
11 DIP lender, New Millennia Group.

12 4. To date, the process server’s attempts to serve the proposed tenants and DIP lender
13 have failed. True and correct copies of the declarations of the process server are attached hereto as
14 **Exhibit 32.**

15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing is true and correct and that this Declaration was executed on this 3rd day of December,
17 2024, at Los Angeles, California.

18
19 /s/ Gerrick M. Warrington
20 Gerrick M. Warrington
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EXHIBIT 32

ATTORNEY OR PARTY WITHOUT ATTORNEY (State Bar number and State) Gerrick M. Warrington Esq. SBN: 294890 FRANZEL ROBINS BLOOM & CSATO 1000 Wilshire Boulevard, 19th Floor Los Angeles, CA 90017		Case 2:24-bk-12079-VZ Doc 334-1 Filed 12/03/24 Entered 12/03/24 17:00:06 Desc Declaration of Gerrick M. Warrington In Support of Reply In Support Of Archway Page 4 of 7
TELEPHONE NO.: (323) 852-1000 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	FAX NO.:	
USBC/LOS ANGELES/CENTRAL DIVISION STREET ADDRESS: 255 E. TEMPLE CITY AND ZIP CODE: LOS ANGELES, CA 90012		REFERENCE NUMBER: 101415-0002
Plaintiff(s): Central In re SEATON INVESTMENTS, LLC, et al Defendant(s): The DMB Fund, Attn		
DECLARATION OF DILIGENCE		CASE NUMBER: 2:24-bk-12079-VZ

I received the within assignment for filing and/or service on November 25, 2024 and that after due and diligent effort I have not been able to serve said person.I attempted service on this servee on the following dates and times:

Servee: **The DMB Fund, Attn**

Documents: **SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)**

Address: **2350 Castle Heights Ave
Los Angeles, CA 90034**

As enumerated below:

11/26/2024 -- 10:20 AM 2350 Castle Heights Ave
Business Los Angeles, CA 90034

Arrived at address and knocked loudly on front door, several times with no answer. No activity seen anywhere in the home or on the property. No mail in the mailbox. No cars in driveway.

11/29/2024 -- 9:08 AM 2350 Castle Heights Ave
Business Los Angeles, CA 90034

Returned to property, and knocked loudly on front door several times. I got no answer. No activity seen or heard. No cars parked on driveway or in front of home.

12/1/2024 -- 6:19 PM 2350 Castle Heights Ave
Business Los Angeles, CA 90034

Returned to property, and knocked loudly on front door several times. I got no answer. No activity seen or heard. No cars parked on driveway or in front of home.

County: **Los Angeles**
 Registration No.: **2018032404**
Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015

I declare under penalty of perjury under the laws of the State of California that I am over the age of 18, not a party to this action and that the foregoing is true and correct. This declaration was executed on 12/3/2024.

Signature: 
Robert Brooks

DECLARATION OF DILIGENCE

Order#: LA587842/DilFormat.mdl

ATTORNEY OR PARTY WITHOUT ATTORNEY (State Bar number and State Bar name) Gerrick M. Warrington Esq. SBN: 294890 FRANDZEL ROBINS BLOOM & CSATO 1000 Wilshire Boulevard, 19th Floor Los Angeles, CA 90017		Case 2:24-bk-12079-VZ Doc 334-1 Filed 12/03/24 Entered 12/03/24 17:00:06 Desc Declaration of Gerrick M. Warrington In Support of Reply In Support Of Archway Page 5 of 7	
TELEPHONE NO.: (323) 852-1000 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):		FAX NO.:	
USBC/LOS ANGELES/CENTRAL DIVISION STREET ADDRESS: 255 E. TEMPLE CITY AND ZIP CODE: LOS ANGELES, CA 90012		REFERENCE NUMBER: 101415-0002	
Plaintiff(s): SEATON INVESTMENTS, LLC, et al. Defendant(s):			
DECLARATION OF DILIGENCE		CASE NUMBER: 2:24-bk-12079-VZ	

I received the within assignment for filing and/or service on November 25, 2024 and that after due and diligent effort I have not been able to serve said person.I attempted service on this servee on the following dates and times:

 Servee: **Levav Group LLC**


 Documents: **SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMITINSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)**

 Address: **1702 S Robertson Blvd # 261**
 Los Angeles, CA 900354316

As enumerated below:

11/26/2024 -- 11:01 AM 1702 S Robertson Blvd # 261
Business Los Angeles, CA 900354316

Arrived at address which is a PO box shipping store. Upon speaking with the store manager, she stated that PO box number 261 is being used by an individual by the name of Aaron Stock.



County: **Los Angeles**
 Registration No.: **2018032404**
Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015

I declare under penalty of perjury under the laws of the State of California that I am over the age of 18, not a party to this action and that the foregoing is true and correct. This declaration was executed on 12/3/2024.

Signature: 
Robert Brooks

ATTORNEY OR PARTY WITHOUT ATTORNEY (Print Name, State Bar number, and SBN) Gerrick M. Warrington Esq. SBN: 294890 FRANZEL ROBINS BLOOM & CSATO 1000 Wilshire Boulevard, 19th Floor Los Angeles, CA 90017 TELEPHONE NO.: (323) 852-1000 FAX NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):		Case 2:24-bk-12079-VZ Doc 334-1 Filed 12/03/24 Entered 12/03/24 17:00:06 Desc Declaration of Gerrick M. Warrington In Support of Reply In Support Of Archway Page 6 of 7
USBC/LOS ANGELES/CENTRAL DISTRICT OF CA STREET ADDRESS: 255 E. TEMPLE ST. CITY AND ZIP CODE: LOS ANGELES, CA 90012	REFERENCE NUMBER: 101415-0002	
Plaintiff(s): In re SEATON INVESTMENTS, LLC, et al. Defendant(s):		
DECLARATION OF DILIGENCE		CASE NUMBER: 2:24-bk-12079-VZ

I received the within assignment for filing and/or service on November 25, 2024 and that after due and diligent effort I have not been able to serve said person.I attempted service on this servee on the following dates and times:

Servee: Zenith Healthcare Management, LLC

Documents: SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMITINSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

Address: 5030 Campus Dr
Newport Beach, CA 926602102

As enumerated below:

11/27/2024 -- 1:43 PM 5030 Campus Dr
Business Newport Beach, CA 926602102

Company at location is the Horowitz Group and staff has never heard of subject, company or agent we are looking for. The Horowitz Group is the only company at this address.

County: Orange
Registration No.: 1530
Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015

I declare under penalty of perjury under the laws of the State of California that I am over the age of 18, not a party to this action and that the foregoing is true and correct. This declaration was executed on 12/3/2024.

Signature: 
Frank Harrigan

ATTORNEY OR PARTY WITHOUT ATTORNEY (Print Name, State Bar number, and SBN) Gerrick M. Warrington Esq. SBN: 294890 FRANDZEL ROBINS BLOOM & CSATO 1000 Wilshire Boulevard, 19th Floor Los Angeles, CA 90017		Case 2:24-bk-12079-VZ Doc 334-1 Filed 12/03/24 Entered 12/03/24 17:00:06 Desc Declaration of Gerrick M. Warrington In Support of Reply In Support Of Archway Page 7 of 7
TELEPHONE NO.: (323) 852-1000 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	FAX NO.:	
USBC/LOS ANGELES/CENTRAL DISTRICT OF CA STREET ADDRESS: 255 E. TEMPLE ST. CITY AND ZIP CODE: LOS ANGELES, CA 90012		REFERENCE NUMBER: 101415-0002
Plaintiff(s): In Re: SEATON INVESTMENTS, LLC, et al. Defendant(s):		
DECLARATION OF DILIGENCE		CASE NUMBER: 2:24-bk-12079-VZ

I received the within assignment for filing and/or service on November 25, 2024 and that after due and diligent effort I have not been able to serve said person.I attempted service on this servee on the following dates and times:

Servee: **New Millennia Group**

Documents: **SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)**

Address: **2945 Townsgate Rd Ste 200
Westlake Village, CA 913615866**

As enumerated below:

11/27/2024 -- 10:18 AM 2945 Townsgate Rd Ste 200
Business Westlake Village, CA 913615866
Unable to gain access to suite this day. I will continue.

11/29/2024 -- 3:11 PM 2945 Townsgate Rd Ste 200
Business Westlake Village, CA 913615866
Door locked. I will continue.

12/2/2024 -- 1:00 PM 2945 Townsgate Rd Ste 200
Business Westlake Village, CA 913615866
Bad address. I spoke with onsite female for this executive suite who said New Millenia Group signed a lease in Feb 2022 but never moved in and returns their mail to USPS. The female receptionist is a black female, 35 years, Sitting, 180 lbs.

County:
Registration No.: **787**
Nationwide Legal, LLC
1609 James M Wood Blvd.
Los Angeles, CA 90015

I declare under penalty of perjury under the laws of the State of California that I am over the age of 18, not a party to this action and that the foregoing is true and correct. This declaration was executed on 12/3/2024.

Signature: Sandra Espinoza
Sandra Espinoza